

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR MANAGEMENT**

**Cabinets by Nichols, Inc.  
69 West State Road 144  
Bargersville, Indiana 46106**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F081-10896-00033	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary wood cabinet manufacturing facility.

Authorized individual: Robert E. Nichols, Jr.  
Source Address: 69 West State Road 144, Bargersville, Indiana 46106  
Mailing Address: P.O. Box 545, Bargersville, Indiana 46106  
Phone Number: (317) 422-5188  
SIC Code: 2434  
County Location: Johnson  
County Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) woodworking facility, identified as WW-1, operating at a maximum rate of 171.72 pounds of solid wood per hour and 187.03 pounds of plywood per hour, utilizing a baghouse (ID #BW-1) for particulate emission control, exhausting back into the building through vent S/V ID# 1;
- (b) One (1) flat paint coating line, consisting of three (3) spray booths, identified as PB-15, PB-16, and PB-17, constructed in 1986, 1994, and 1974, respectively, each operating at a maximum rate of 360 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 15, 16, and 17, respectively; and
- (c) One (1) spray paint coating line, consisting of three (3) spray booths, identified as PB-21, PB-22, and PB-23, each constructed in 1999, each operating at a maximum rate of 90 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 21, 22, and 23, respectively.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

### A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

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- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

## **SECTION B                      GENERAL CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

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Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### **B.2      Definitions [326 IAC 2-8-1]**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

### **B.3      Permit Term [326 IAC 2-8-4(2)]**

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This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### **B.4      Enforceability [326 IAC 2-8-6]**

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- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

### **B.5      Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### **B.6      Severability [326 IAC 2-8-4(4)]**

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.7      Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8      Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]**

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- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM within a reasonable time, any information that IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; and
- (3) Denial of a permit renewal application.

- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015



- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15** Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal** [326 IAC 2-8-3(h)]

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

(2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

**B.20 Operational Flexibility [326 IAC 2-8-15]**

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- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.  
  
Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).
- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.21 Construction Permit Requirement [326 IAC 2]**

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Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-8-5(a)(4)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

**B.24 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

**B.25 Advanced Source Modification Approval [326 IAC 2-8-4(11)]**

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The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 and such modifications occur only during the term of this permit.



## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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**C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notify:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the

“authorized individual” as defined by 326 IAC 2-1.1-1(1).

**C.10 Monitoring Methods [326 IAC 3]**

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**C.11 Pressure Gauge Specifications**

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

**C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition

of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
  - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **C.15 Monitoring Data Availability**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

#### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;

- (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)]**

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.



## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]

One (1) woodworking facility, identified as WW-1, operating at a maximum rate of 171.72 pounds of solid wood per hour and 187.03 pounds of plywood per hour, utilizing a baghouse (ID #BW-1) for particulate emission control, exhausting back into the building through vent S/V ID# 1

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 0.82 pounds per hour when operating at a process weight rate of 187.03 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.1.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.1.4 Particulate Matter (PM)

The baghouse for PM control shall be in operation at all times when the woodworking facility is in operation.

#### D.1.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### D.1.6 Broken or Failed Bag Detection

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### D.1.7 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of the results of the inspections required under Condition D.1.5 and the dates the vents are redirected.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]

- (a) One (1) flat paint coating line, consisting of three (3) spray booths, identified as PB-15, PB-16, and PB-17, constructed in 1986, 1994, and 1974, respectively, each operating at a maximum rate of 360 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 15, 16, and 17, respectively; and
- (b) One (1) spray paint coating line, consisting of three (3) spray booths, identified as PB-21, PB-22, and PB-23, each constructed in 1999, each operating at a maximum rate of 90 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 21, 22, and 23, respectively.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

### Construction Conditions for the Spray Paint Coating Line Only

#### General Construction Conditions

- D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

#### Effective Date of the Permit

- D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.2.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

### Operation Conditions for the Flat and Spray Paint Coating Lines

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

##### D.2.4 Volatile Organic Compound (VOC) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, volatile organic compound emissions from the flat and spray paint coating lines shall not exceed 98 tons per year. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

##### D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to

wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

**D.2.6 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]**

The flat and spray coating lines are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ). The amount of single and total HAPs delivered to the applicator of the flat and spray paint coating lines shall be limited to less than 10 and 25 tons per 12 month period, rolled on a monthly basis, respectively. This limit is required to avoid the requirements of 326 IAC 20-14, (40 CFR 63, Subpart JJ). Any change or modification, from the flat and spray coating lines that would lead to an increase in source wide single and total HAP emissions to more than 10 and 25 tons per 12 month period, rolled on a monthly basis, shall obtain approval from the Office of Air Management (OAM), as required by 326 IAC 2-1 before such change can occur.

**D.2.7 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

The PM from the flat and spray paint coating lines shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**D.2.8 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

**D.2.9 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the single and total HAP limits specified in Condition D.2.6 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.2.10 Single and Total HAP Emissions**

Compliance with Condition D.2.6 shall be demonstrated within 30 days of the end of each month based on the single and total HAP usage for the most recent twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### D.2.11 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the flat and spray paint coating lines are in operation.

#### D.2.12 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the flat and spray paint coating line stacks (S/V ID# 15, 16, 17, 21, 22, and 23) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.2.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.4 and D.2.6, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.2.4 and D.2.6.
  - (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC and HAP usage for each month; and
  - (5) The weight of VOC and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.2.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.14 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.2.6 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Cabinets by Nichols, Inc.  
Source Address: 69 West State Road 144, Bargersville, Indiana 46106  
Mailing Address: P.O. Box 545, Bargersville, Indiana 46106  
FESOP No.: F081-10896-00033

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Cabinets by Nichols, Inc.  
Source Address: 69 West State Road 144, Bargersville, Indiana 46106  
Mailing Address: P.O. Box 545, Bargersville, Indiana 46106  
FESOP No.: F081-10896-00033

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<b>9</b>	1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the Office of Air Management (OAM), within four <b>(4)</b> business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and CThe Permittee must submit notice in writing or by facsimile within two <b>(2)</b> days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<b>9</b>	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) CThe Permittee must submit notice in writing within ten <b>(10)</b> calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:



If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Cabinets by Nichols, Inc.  
Source Address: 69 West State Road 144, Bargersville, Indiana 46106  
Mailing Address: P.O. Box 545, Bargersville, Indiana 46106  
FESOP No.: F081-10896-00033  
Facility: flat and spray paint coating lines  
Parameter: Single hazardous air pollutants (HAPs)  
Limit: The single HAP usage is limited to less than 10 tons per twelve (12) month period, rolled on a monthly basis.

YEAR: \_\_\_\_\_

Month	Total Single HAP (tons)	Total Single HAP (tons)	Total Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Cabinets by Nichols, Inc.  
Source Address: 69 West State Road 144, Bargersville, Indiana 46106  
Mailing Address: P.O. Box 545, Bargersville, Indiana 46106  
FESOP No.: F081-10896-00033  
Facility: flat and spray paint coating lines  
Parameter: Total hazardous air pollutants (HAPs)  
Limit: The total HAP usage is limited to less than 25 tons per twelve (12) month period,  
rolled on a monthly basis.

YEAR: \_\_\_\_\_

Month	Total HAPs (tons)	Total HAPs (tons)	Total HAPs (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Cabinets by Nichols, Inc.  
Source Address: 69 West State Road 144, Bargersville, Indiana 46106  
Mailing Address: P.O. Box 545, Bargersville, Indiana 46106  
FESOP No.: F081-10896-00033

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b> (eg. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

Mail to: Permit Administration & Development Section  
Office Of Air Management  
100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015

Cabinets by Nichols, Inc.  
P.O. Box 545  
Bargersville, Indiana 46106

**Affidavit of Construction**

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make  
these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Cabinets by Nichols, Inc., 69 West State Road, Bargersville, Indiana, 46106, has  
constructed the spray paint coating line in conformity with the requirements and intent of the construction  
permit application received by the Office of Air Management on April 23, 1999 and as permitted pursuant to **n**  
**FESOP No. F-081-10896, Plant ID No. 081-00033** issued on \_\_\_\_\_

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information  
and belief.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of  
Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_.  
My Commission expires: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name (typed or printed)

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

#### Source Background and Description

<b>Source Name:</b>	Cabinets by Nichols, Inc.
<b>Source Location:</b>	69 West State Road 144, Bargersville, Indiana 46106
<b>County:</b>	Johnson
<b>SIC Code:</b>	2434
<b>Operation Permit No.:</b>	F081-10896-00033
<b>Permit Reviewer:</b>	Yvette de los Angeles/EVP

On June 17, 1999, the Office of Air Management (OAM) had a notice published in the Daily Journal, Franklin, Indiana, stating that Cabinets by Nichols, Inc. had applied for a Federally Enforceable Operating Permit for the operation of a wood cabinet manufacturing facility. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 13, 1999, Cabinets by Nichols, Inc. submitted comments on the proposed Federally Enforceable Operating Permit. The summary of the comments and corresponding responses are as follows (changes in bold or strikeout for emphasis):

#### Comment 1:

Section A.2 - Emission Units and Pollution Control Equipment and Section D.2 - Facility Operation Conditions: Paint Booth PB-17 was incorrectly identified as PV-17. Please correct this typographical error found in Sections A.2 and D.2.

#### Response 1:

Sections A.2 and D.2 will be modified as follows:

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) woodworking facility, identified as WW-1, operating at a maximum rate of 171.72 pounds of solid wood per hour and 187.03 pounds of plywood per hour, utilizing a baghouse (ID #BW-1) for particulate emission control, exhausting back into the building through vent S/V ID# 1;

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

#### Source Background and Description

<b>Source Name:</b>	Cabinets by Nichols, Inc.
<b>Source Location:</b>	69 West State Road 144, Bargersville, Indiana 46106
<b>County:</b>	Johnson
<b>SIC Code:</b>	2434
<b>Operation Permit No.:</b>	F081-10896-00033
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#### Comment 1:

Section A.2 - Emission Units and Pollution Control Equipment and Section D.2 - Facility Operation Conditions: Paint Booth PB-17 was incorrectly identified as PV-17. Please correct this typographical error found in Sections A.2 and D.2.

#### Response 1:

Sections A.2 and D.2 will be modified as follows:

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) woodworking facility, identified as WW-1, operating at a maximum rate of 171.72 pounds of solid wood per hour and 187.03 pounds of plywood per hour, utilizing a baghouse (ID #BW-1) for particulate emission control, exhausting back into the building through vent S/V ID# 1;

- (b) One (1) flat paint coating line, consisting of three (3) spray booths, identified as PB-15, PB-16, and ~~PV-17~~ **PB-17**, constructed in 1986, 1994, and 1974, respectively, each operating at a maximum rate of 360 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 15, 16, and 17, respectively; and
- (c) One (1) spray paint coating line, consisting of three (3) spray booths, identified as PB-21, PB-22, and PB-23, each constructed in 1999, each operating at a maximum rate of 90 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 21, 22, and 23, respectively.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]

- (a) One (1) flat paint coating line, consisting of three (3) spray booths, identified as PB-15, PB-16, and ~~PV-17~~ **PB-17**, constructed in 1986, 1994, and 1974, respectively, each operating at a maximum rate of 360 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 15, 16, and 17, respectively; and
- (b) One (1) spray paint coating line, consisting of three (3) spray booths, identified as PB-21, PB-22, and PB-23, each constructed in 1999, each operating at a maximum rate of 90 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 21, 22, and 23, respectively.

### Comment 2:

Conditions D.1.2 and D.2.8 - Preventative Maintenance Plan: We would request that this condition be amended to read as follows: "A Preventative Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit is required for the particulate control devices used for these emission units." We believe that this language is more appropriate as it does not suggest that a preventative maintenance plan is required for the individual emission units themselves.

### Response 2:

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that



section the permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

Most permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the permittee may know from experience, what replacement parts should be kept on hand. The permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be include in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities, not just the individual emission units themselves. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

Therefore, there are no changes to this permit due to this comment.

**Comment 3:**

Condition D.2.6 - Hazardous Air Pollutants (HAPs): We believe that the references citation is incorrect. The condition states that "Therefore, the maximum achievable control technology (MACT) requirement in 326 IAC 2-4.1-1 (New Source Toxics Control) does not apply." A limit of less than 10 and 25 tons per year for single and combined HAPs, respectively, was proposed such that the facility would not be subject to 40 CFR 63, Subpart JJ (NESHAP), not the state rule 2-4.1-1. We request that this condition be changed to reference the correct citation.

**Response 3:**

OAM agrees with the above comment and Condition D.2.6 will be modified as follows:

~~D.2.6 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]~~

~~Therefore, the maximum achievable control technology (MACT) requirement in 326 IAC 2-4.1-1 (New Source Toxics Control) does not apply. Any change or modification, from the spray paint coating line that would increase in source wide single and total HAP emissions to more than 10 and 25 tons per year, shall obtain approval from the Office of Air Management (OAM), as required by 326 IAC 2-1 before such change can occur.~~

**D.2.6 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]**

The flat and spray coating lines are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ). The amount of single and total HAPs delivered to the applicator of the flat and spray paint coating lines shall be limited to less than 10 and 25 tons per 12 month period, rolled on a monthly basis, respectively. This limit is required to avoid the requirements of 326 IAC 20-14, (40 CFR 63, Subpart JJ). Any change or modification, from the flat and spray coating lines that would lead to an increase in source wide single and total HAP emissions to more than 10 and 25 tons per 12 month period, rolled on a monthly basis, shall obtain approval from the Office of Air Management (OAM), as required by 326 IAC 2-1 before such change can occur.

**Comment 4:**

Condition D.2.10 - Single and Total HAP Emissions: This condition currently states that compliance with Condition D.2.6 must be demonstrated within 30 days of the end of each month. We request that this condition be changed to "Compliance with Condition D.2.6 shall be demonstrated within 30 days of the end of each quarter..." to reflect the reporting requirements of Condition D.2.14.

**Response 4:**

Condition D.2.14 states that the report required to document compliance with Condition D.2.6 shall be submitted to OAM four (4) times per year. Condition D.2.10 requires that the source must report the single and total HAP usage within 30 days of the end of each month. Even though compliance is required at the end of each month, the reporting requirements are only required four (4) times per year. Therefore, there is no change to the permit due to this comment.

**Comment 5:**

Condition D.2.13 - Record Keeping Requirements: This condition discusses the reporting requirements to demonstrate compliance with Condition D.2.6, HAPs. This condition does not state the reporting requirements to demonstrate compliance with Condition D.2.4, VOCs. We request that condition be modified such that the reporting requirements for HAPs and VOCs are both stated.

**Response 5:**

Condition D.2.13 will be modified as follows:

**D.2.13 Record Keeping Requirements**

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- (a) To document compliance with Conditions **D.2.4 and D.2.6**, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the **VOC and HAP** usage limits and/or the **VOC and HAP** emission limits established in Conditions **D.2.4 and D.2.6**.
  - (1) The amount and **VOC and HAP** content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total **VOC and HAP** usage for each month; and
  - (5) The weight of **VOC and HAPs** emitted for each compliance period.

## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)**

#### **Source Background and Description**

**Source Name:** Cabinets by Nichols, Inc.  
**Source Location:** 69 West State Road 144, Bargersville, Indiana 46106  
**County:** Johnson  
**SIC Code:** 2434  
**Operation Permit No.:** F081-10896-00033  
**Permit Reviewer:** Yvette de los Angeles/EVP

The Office of Air Management (OAM) has reviewed a FESOP application from Cabinets by Nichols, Inc. relating to the operation of a wood cabinet manufacturing facility.

#### **Permitted Emission Units and Pollution Control Equipment**

There are no permitted facilities operating at this source during this review process.

#### **Unpermitted Emission Units and Pollution Control Equipment**

The source also consists of the following unpermitted facilities/units:

- (a) One (1) woodworking facility, identified as WW-1, operating at a maximum rate of 171.72 pounds of solid wood per hour and 187.03 pounds of plywood per hour, utilizing a baghouse (ID #BW-1) for particulate emission control, exhausting back into the building through vent S/V ID# 1; and
- (b) One (1) flat paint coating line, consisting of three (3) spray booths, identified as PB-15, PB-16, and PV-17, constructed in 1986, 1994, and 1974, respectively, each operating at a maximum rate of 360 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 15, 16, and 17, respectively.

#### **New Emission Units and Pollution Control Equipment Receiving Prior Approval**

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (a) One (1) spray paint coating line, consisting of three (3) spray booths, identified as PB-21, PB-22, and PB-23, each constructed in 1999, each operating at a maximum rate of 90 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 21, 22, and 23, respectively.

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural-gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) Two (2) drying ovens on the spray paint line, each with a maximum heat input capacity of one (1) MMBtu per hour;
- (b) Infrared cure equipment:
  - (1) One (1) drying ovens on the flat paint coating line; and
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

### Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the baghouse be considered as an integral part of the woodworking facility:

- (a) The woodworking facility can not operate without the baghouse.

IDEM, OAM has evaluated the justifications and agreed that the baghouse will be considered as an integral part of the woodworking facility. Therefore, the permitting level will be determined using the potential to emit after the baghouse. Operating conditions in the proposed permit will specify that this baghouse shall operate at all times when the woodworking facility is in operation.

### Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on April 23, 1999. Additional information was received on May 17, 1999.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (five (5) pages).

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	11.98
PM-10	11.98
SO <sub>2</sub>	0.00
VOC	113.96
CO	0.00
NO <sub>x</sub>	0.00

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	less than 10
Toluene	greater than 10
Formaldehyde	less than 10
Methanol	less than 10
Ethyl Benzene	less than 10
MIBK	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

## Actual Emissions

No previous emission data has been received from the source.

## Limited Potential to Emit

- (a) The source has accepted a federally enforceable limit on potential to emit VOC of less than 100 tons per year, consisting of:
  - (i) 98 tons per year for the significant activities; and
  - (ii) 0.05 tons per year for the insignificant activities.
- (b) The source has accepted a limit on potential to emit of less than 10 tons per year for any single HAP and less than 25 tons per year for any combination of HAPs.

- (c) The table below summarizes the total limited potential to emit of the significant emission units.

	Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAPs	Total HAPs
Woodworking Facility	3.58	1.14	0.00	0.00	0.00	0.00	0.00	0.00
Surface Coating Operations	0.27	0.27	0.00	98	0.00	0.00	< 10	< 25
Insignificant Activities	0.02	0.07	0.01	0.05	0.74	0.88	0.00	0.00
Total Emissions	3.87	1.48	0.01	98.05	0.74	0.88	< 10	< 25

### County Attainment Status

The source is located in Johnson County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Johnson County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The flat and spray paint coating lines are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ) because the facility will limit emissions of single and total HAPs to less than major source levels for HAP emissions as defined in 40 CFR 63.2.

### State Rule Applicability - Entire Source

#### 326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to 326 IAC 2-2 (Prevention of Significant Deterioration) because the source is located in Johnson County, the federally enforceable limited potential to emit of any pollutant is less than 250 tons per year, and the source is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

**326 IAC 2-6 (Emission Reporting)**

This source is located in Johnson County and the potential to emit any regulated pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

**326 IAC 2-8-4 (FESOP)**

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the total usage of any single HAP and any combination of HAPs in the two (2) coating lines shall be limited to 9.9 and 24 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. This will limit source wide single HAP emissions to less than 10 tons per year and will limit source wide total HAP emissions to less than 25 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

**326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**State Rule Applicability - Individual Facilities**

**326 IAC 2-4.1-1 (New Source Toxics Control)**

326 IAC 2-4.1-1 applies to new or reconstructed facilities with potential emissions of any single HAP equal or greater than ten (10) tons per twelve (12) month period and potential emissions of a combination of HAPs greater than or equal to twenty-five (25) tons per twelve (12) month period. The flat and spray paint coating lines will limit any single HAP to less than 10 tons per twelve (12) month period, rolled on a monthly basis, and will limit a combination of HAPs to less than 25 tons per twelve (12) month period, rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

**326 IAC 6-3-2 (Process Operations)**

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the woodworking facility shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10(0.09^{0.67}) = 0.82 \text{ lbs/hr} = 3.58 \text{ tons/yr}$$

The baghouse shall be in operation at all times the woodworking facility is in operation, in order to comply with this limit.

Based on this calculation, the controlled potential PM emissions of 1.14 tons/yr are less than the allowable emissions of 3.58 tons/yr. Therefore, woodworking facility complies with the rule.

- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) overspray



emissions from the flat paint coating line and the spray paint coating line shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour,} \\ P = \text{process weight in tons per hour.}$$

The dry filters shall be in operation at all times the flat paint coating line and the spray paint coating line are in operation, in order to comply with this limit.

#### 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

The flat and the spray paint coating lines are subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). The surface coatings applied to wood furniture and/or wood components shall utilize one or more of the following application methods:

Airless Spray Application	Air-Assisted Airless Spray Application
Electrostatic Spray Application	Electrostatic Bell or Disc Application
Heated Airless Spray Application	Roller Coating
Brush or Wipe Application	Dip-and-Drain Application
High Volume Low Pressure HVLP	Aerosol Spray Cans

High volume low pressure spray is an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The flat and the spray paint coating lines will utilize High Volume Low Pressure (HVLP) Spray Application systems in order to comply with the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

#### 326 IAC 8-11 (Wood Furniture Coating)

This source is not subject to 326 IAC 8-11. This rule applies to any person performing wood furniture operations in Lake, Porter, Clark or Floyd County. This source is located in Johnson County.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as

grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The woodworking facility has applicable compliance monitoring conditions as specified below:

- (a) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

These monitoring conditions are necessary because the baghouse for the woodworking facility must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

2. The flat and the spray paint coating lines have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the flat and the spray paint coating line stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary because the dry filters for the flat and the spray paint coating lines must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

## **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations (Page 2 and 5 of 5).

## **Conclusion**

The operation of this wood cabinet manufacturing facility shall be subject to the conditions of the attached proposed **FESOP No.: F081-10896-00033**.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: Cabinets by Nichols, Inc.**  
**Address City IN Zip: 69 West State Road 144, Bargersville, IN 46106**  
**CP: 081-10896**  
**Plt ID: 081-00033**  
**Reviewer: Yvette de los Angeles/EVP**  
**Date: 08/17/99**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal per Hour (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Topcoat	7.91	62.70%	0.0%	62.7%	0.0%	30.00%	1.11	4.96	4.96	5.51	132.12	24.11	3.59	16.53	75%
Sealer	7.54	69.80%	0.0%	69.8%	0.0%	30.20%	1.11	5.26	5.26	5.84	140.20	25.59	2.77	17.43	75%
Stain	8.27	75.38%	0.0%	75.4%	0.0%	12.55%	0.44	6.23	6.23	2.74	65.83	12.01	0.98	49.67	75%
Primer	6.98	81.67%	0.0%	81.7%	0.0%	11.06%	1.11	5.70	5.70	6.33	151.86	27.72	1.56	51.54	75%
Paint	6.65	75.86%	0.0%	75.9%	0.0%	14.00%	1.11	5.04	5.04	5.60	134.39	24.53	1.95	36.03	75%
State Potential Emissions															

\* In order to avoid the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control), the single and total HAP usage shall be less than 10 and 25 tons per year.  
Therefore, the single HAP usage is limited to 28.07% of the potential uncontrolled emissions (9.90/35.27 = 28.07%).

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal per Hour (gal/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal per Hour (gal/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal per Hour (gal/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (gal/hr) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**

**Company Name:** Cabinets by Nichols, Inc.  
**Address City IN Zip:** 69 West State Road 144, Bargersville, IN 46106  
**CP#:** 081-10896  
**Plt ID:** 081-00033  
**Permit Reviewer:** Yvette de los Angeles/EVP  
**Date:** 08/17/99

Material	Density (Lb/Gal)	Gallons per Hour (gal/hr)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Methanol	Weight % Ethyl Benzene	Weight % MIBK	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MIBK Emissions (ton/yr)	TOTAL HAP EMISSIONS (ton/yr)
Topcoat	7.91	1.11	17.00%	29.00%	0.20%	1.00%	0.00%	0.00%	6.54	11.15	0.08	0.38	0.00	0.00	18.15
Sealer	7.54	1.11	0.00%	6.00%	0.04%	0.00%	3.00%	6.00%	0.00	2.20	0.02	0.00	1.10	2.20	5.51
Stain	8.27	0.44	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Primer	6.98	1.11	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paint	6.65	1.11	5.70%	67.80%	0.00%	0.00%	0.00%	0.00%	1.84	21.92	0.00	0.00	0.00	0.00	23.76
Total Uncontrolled Potential Emissions									8.38	35.27	0.09	0.38	1.10	2.20	47.43
Federal Potential Emissions (controlled):															
Total Controlled Potential Emissions								* Material Usage Limitation	Limited Xylene Emissions (tons/yr)	Limited Toluene Emissions (tons/yr)	Limited Formaldehyde Emissions (tons/yr)	Limited Methanol Emissions (tons/yr)	Limited Ethyl Benzene Emissions (tons/yr)	Limited MIBK Emissions (tons/yr)	LIMITED TOTAL EMISSIONS (tons/yr)
								28.07%	2.35	9.90	0.03	0.11	0.31	0.62	13.31

\* In order to avoid the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control), the single and total HAP usage shall be less than 10 and 25 tons per year.  
 Therefore, the single HAP usage is limited to 28.07% of the potential uncontrolled emissions (9.90/35.27 = 28.07%).

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal per Hour (gal/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Process Particulate Emissions**

**Company Name:** Cabinets by Nichols, Inc.  
**Address City IN Zip:** 69 West State Road 144, Bargersville, IN 46106  
**CP#:** 081-10896  
**Plt ID:** 081-00033  
**Permit Reviewer:** Yvette de los Angeles/EVP  
**Date:** 08/17/99

<b>Potential Emissions (tons/year)</b>						
<b>A. Baghouses</b>						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> )	Total Filter Area (ft <sup>2</sup> )	Control Efficiency	Total (tons/yr)
Woodworking	1	0.00087	6.8	5,162	99.90%	1.14
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls						<b>1.14</b>

Methodology:Potential Emissions:

Baghouse (tons/yr) = No. Units \* Loading (grains/acf) \* Air/Cloth Ratio (acfm/ft<sup>2</sup>) \* Filter Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**Insignificant Activities - Two (2) Drying Ovens**

Page 4 of 5 TSD App A

**Company Name: Cabinets by Nichols, Inc.**  
**Address City IN Zip: 69 West State Road 144, Bargersville, IN 46106**  
**CP: 081-10896**  
**Plt ID: 081-00033**  
**Reviewer: Yvette de los Angeles/EVP**  
**Date: 08/17/99**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

2.0

17.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.02	0.07	0.01	0.88	0.05	0.74

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 5 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**Insignificant Activities - Two (2) Drying Ovens**  
**HAPs Emissions**

Page 5 of 5 TSD App A

**Company Name: Cabinets by Nichols, Inc.**  
**Address City IN Zip: 69 West State Road 144, Bargersville, IN 46106**  
**CP: 081-10896**  
**Plt ID: 081-00033**  
**Reviewer: Yvette de los Angeles/EVP**  
**Date: 08/17/99**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.840E-05	1.051E-05	6.570E-04	1.577E-02	2.978E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.380E-06	9.636E-06	1.226E-05	3.329E-06	1.840E-05

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.